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April 13, 2022

By ECF

Hon. George B. Daniels United States District Judge Southern District of New York 500 Pearl Street New York, New York 1007

APR 1 8 2022

GEB. JOHNS

UNITED STATES DISTRICT JUDGE

SO ORDERED

Re:

United States v. Karlos Alberto De La Puerta Rodriguez

18 Cr. 782 (GBD)

Dear Judge Daniels:

I represent Mr. De La Puerta Rodriguez in the above-named matter. I write without objection from the government, by AUSA Stephanie Lake, and Pretrial Services Officer Ashley Cosme to request a temporary modification of my client's bond conditions.

Mr. De La Puerta Rodriguez is on pretrial release in the Southern District of California and subject to conditions that include home incarceration and electronic monitoring. He respectfully requests a temporary modification of his bond conditions to permit him to travel to Disneyland in Anaheim, California on April 27, 2022, which is approximately two hours from his home. Mr. De La Puerta Rodriguez will be traveling there by car with his wife and four-year-old son, who is autistic, and they will be joining a school trip in celebration of World Autism Awareness Day. Mr. De La Puerta Rodriguez is his son's primary caretaker, and his assistance is therefore much needed in order for his son to attend the trip.

My office has conferred with Pretrial Services Officer Cosme, who states that Mr. De La Puerta's supervising officer in California informs that he has been in compliance with his bail conditions, and Pretrial Services therefore does not object given the circumstances surrounding the request.

If this application is granted, Mr. De La Puerta Rodriguez will provide his Pretrial Services Officer with all the necessary information prior to his trip.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,

/s/

David Stern

cc: AUSA Stephanie Lake (by ECF)